

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

KALOMA CARDWELL,

*Plaintiff,*

v.

DAVIS POLK & WARDWELL LLP,  
THOMAS REID, JOHN BICK, HAROLD  
BIRNBAUM, DANIEL BRASS, and BRIAN  
WOLFE,

*Defendants.*

19 Civ. 10256 (GHW)

**NOTICE OF DEFENDANTS' MOTION TO COMPEL PRODUCTION  
OF DOCUMENTS AND INTERROGATORY RESPONSES**

Please take notice that defendants Davis Polk & Wardwell LLP, John Bick, Harold Birnbaum, Daniel Brass, Thomas Reid, and Brian Wolfe will move before the Honorable Gregory H. Woods, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order pursuant to Federal Rule of Civil Procedure 26 and 37 to compel responses to defendants' written discovery, and for related relief.

A memorandum of law supports this motion and is filed contemporaneously herewith.

Dated: November 18, 2020  
New York, New York

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

By: /s/ Bruce Birenboim

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